

December 30, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals TW-A325  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

RE: Ultra-Wideband N.O.I., ET Docket 98-153

Dear Ms. Magalie Roman Salas:

- I am Janice Bradley, Director of the Lewistown Public Library, in Lewistown, Montana. Lewistown is a community of about 6,000 in the exact center of Montana. Four mountain islands surround Lewistown and the terrain is very hilly. The nearest urban area is 109 miles away, Great Falls, a community of about 70,000. There are numerous small communities (population approximately 500) in the same county as Lewistown but the closest community is 17 miles away. The Library's service area includes the entire county, with a population of approximately 12,000.
- The Lewistown Public Library is the largest public library in central Montana with the exception of the library in Great Falls. The Lewistown Library has about 40,000 items and has about 6,000 patrons who use the Library. We are an extremely small and poor library by east and west coast standards.
- The Library's annual budget is about \$160,000 of which \$123,000 goes to salary and benefits. The library materials budget has remained relatively static for the last several years at about \$20,000. According to "Public Libraries in the United States: FY 1995" published by the U.S. Department of Education the District of Columbia and Ohio have the highest per capita expenditures on public libraries at \$34.68. The lowest per capita rate is \$8.86 in Mississippi. Montana's per capita rate is \$12.52. There are only eight states with a per capita rate lower than Montana.
- Not only are we poor but vast areas must be traveled between towns. It's not uncommon in eastern Montana to have towns almost 100 miles apart, with NOTHING in between. The libraries in our county would do well to share our resources but no library but the one in Lewistown has Internet access. Without Internet access it is a very time consuming and labor intensive process to share resources - so we don't share.
- The Library has Internet access because a local Internet Service Provider chose to locate his equipment in the Library and as compensation for the space provides us free Internet service. We have a LAN in the Library and have direct Internet access on virtually every computer in the Library (13 machines). This is very unusual for a library this size. To accomplish this kind of connectivity would be prohibitively expensive, with both the on-going costs to U.S. West as well as the Internet Service Provider's monthly fee.

- We have looked at using wireless radios (spread spectrum) to allow us to electronically communicate with other libraries in the area but the cost is prohibitive given all the repeaters, etc. that would be needed. It was explained to me that the reason the current radios are kept at such low levels is because of the fear that if not kept at these levels radio signals could all begin to get jumbled. But according to Dr. James W. Watson, Manager of the Simulation Technology Division with SPARTA, Inc. they "have seen no interference or degradation of existing communications systems; this is a major consequence that provides relief for the saturating frequency bands. This is of profound importance to the future of both commercial and military communications." David Hughes, Principal Investigator for the NSF Wireless Field Test Project has also determined through much research that "as technology advances, this type of modulation is capable of spreading the signal levels over such a wide bandwidth that the emissions would appear to be similar to background noise."
- Please consider modifying the current rules to allow for commercial application of time-based UWB. According to Dr. Watson, that will accommodate this revolutionary technology without compromise of existing frequency-based systems. If these rules for long distance wireless Internet connections are not modified it is we who reside in the poor, rural areas of our great country that suffer. We are barred from accessing the limitless information that is electronically accessible today. Electronic access is the only hope we have to equal information access that is available in the richer, urban areas because we cannot afford to purchase copies of all the books, magazines, videos, pamphlets, etc. that are needed by our people.

Respectfully Submitted,

Janice Bradley, Director  
Lewistown Public Library  
701 W. Main Street  
Lewistown, MT. 59457  
(406) 538-8559  
[jbradley@lewis-carnegie-library.org](mailto:jbradley@lewis-carnegie-library.org)